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July 19, 2007

VIA FACSIMILE

Hon. John G. Koeltl, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street – Room 1030
New York, New York 10007-1312

*Time to reply extended
to July 23, 2007.
So ordered.
John G. Koeltl
7/19/07. A.S.D.J.*

Re: **Deval Denizcilik Ve Ticaret A.S. v. Repinter International Shipping Co. S.A.
and Miachart Corporation LLC.**
Docket 07 CV 3397

Dear Judge Koeltl:

We write on behalf of Defendants, Repinter International Shipping Co. S.A. and Miachart Corporation LLC (“Repinter-Miachart”), with respect to Defendants’ reply papers due today in connection with Defendants’ motion for counter-security.

Given the complexity of the underlying transaction (three charterparties and associated claims for damages running up and down the chain), and the need to relate the comments contained in the supporting July 19, 2007 Reply Declaration of David M. Semark, Defendants’ London solicitor, to the legal arguments contained in Defendants’ reply brief, as well as incorporate the various explanations of English law which govern, in part, herein, Defendants are respectfully requesting an extension of the ten-page limitation for reply briefs to fifteen pages.

In the event the Court is not inclined to grant the above request, we would respectfully request a one-day extension of time to limit the reply to ten-pages. We have contacted Plaintiff’s New York counsel who has no objection to a one-day extension of time. Mr. Unger was unable to reach Plaintiff’s London counsel to obtain the latter’s permission for an extension of the page limitation.

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On behalf of the Defendants, we thank the Court for its consideration of the above request.

Respectfully submitted,

Keane & Marlowe, LLP.



MaryAnn C. Marlowe

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cc: Freehill, Hogan & Maher, LLP
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Attn: Michael Unger, Esq. (via Facsimile)